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CONFIDENTIAL SETTLEMENT COMMUNICATION;
Subject to Fed. R. Evid. 408

VIA ELECTRONIC MAIL ONLY

Ms. Deborah Benjamin
Associate Regional Counsel
U.S. Environmental Protection Agency
Region 4
Atlanta Federal Center
61 Forsyth Street
Atlanta, GA 30303-8960

Re: Special Notice Letter for the Armstrong World Industries Superfund Site,
Operable Unit 2, Macon, Bibb County, Georgia (the "Armstrong OU2 Site")

Dear Ms. Benjamin:

On behalf of Unimax Corporation ("Unimax"), this letter provides Unimax's initial reply to EPA Region 4's September 22, 2015 Special Notice Letter (the "SNL") for the above-referenced Site. Although Unimax did not receive the SNL directly from EPA (apparently due to an incorrect mailing address), Unimax became aware of the SNL on or about October 7, 2015, and this reply is timely submitted in response to EPA's request for an initial response within thirty days.

By this letter, Unimax informs EPA that it is willing to participate in future discussions regarding the Armstrong OU2 Site, subject to the reservations outlined below. Unimax has begun its review of Site-related information, and has had initial discussions with other parties that received EPA Special Notice Letters for this Site; further discussions among these parties are being scheduled. However, these discussions are at a preliminary stage and therefore Unimax respectfully requests additional time to work with the parties to determine whether and how we may be able to work cooperatively with each other and the Agency to conduct the work specified in the proposed Scope of Work for the Site. In addition, to help facilitate these discussions, Unimax requests that EPA provide it with a copy of the work-performed documents supporting the Agency's demand for reimbursement of \$172,135.20 in unreimbursed Site-related EPA past costs. Unimax further requests that the Agency provide us with a copy of all

documents, records or other information that support Unimax's alleged liability for response costs at the OU2 Site under the federal Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA").

Please note that nothing in this reply should be construed as an admission of liability by Unimax, or by any of its representatives, agents, subsidiaries or affiliates, in connection with the Site. Unimax fully reserves all rights to assert and maintain its legal, equitable and other defenses to any and all alleged liability under CERCLA, and any other applicable statutory or common law relating to the Site.

We look forward to further discussions with the Agency in connection with the Armstrong OU2 Site. Should you have any questions, please do not hesitate to contact the undersigned.

Respectfully submitted,

BAKER BOTTS L.L.P.

By: 
J. Barton Seitz

JBS/sdt